

REMARKS

Favorable reconsideration of the present patent application is respectfully requested in view of the foregoing amendments and the following remarks. As a preliminary matter, the applicant thanks the examiner for the courtesies extended to applicant's representative during the in-person interview of May 18, 2005.

Claims 1, 12-14, 25 and 26 are amended herein, claim 27 is canceled (claims 8-11 were previously canceled). As a result, claims 1-7 and 12-26 are pending in the application.

In the Office Action dated March 30, 2005 includes: an objection to claim 13 for a minor informality; a rejection of claims 13, 25 and 26 under 35 U.S.C. §102(b) in view of U.S. Patent 5,324,980 (Kusunoki); a rejection of claims 1-2, 7, 14-18, 22 and 27 under 35 U.S.C. §103(a) in view of Kusunoki and further in view of JP 08-068991 (Kakehi); and a rejection of claims 3-6, 19-21, 23 and 24 under 35 U.S.C. §103(a) in view of Kusunoki and further in view of Kakehi and yet further in view of U.S. Patent 5,501,990 (Holm). It is believed that these rejections and the claim objection have been overcome by this Amendment.

Claim Objection

The Office Action objected to the term "the substrate" which appeared in claim 13 due to a minor typographical error in the courtesy copy of the claims provided in conjunction with the response of March 7, 2005. This typographical error has been removed. Accordingly, withdrawal of the objection is respectfully requested.

§102 and §103 Rejections

It is respectfully submitted that this Amendment overcomes the pending §102 and §103 rejections in view of the various combinations of the Kusunoki patent, the Kakehi patent and the Holm patent.

The Office Action contends that the Kusunoki patent teaches a number of things. For example, at page 2 the Office Action contends that Kusunoki teaches including “a substrate (901b) (see fig. 20F) supporting a micromechanical sensor element (916).” This contention is respectfully traversed since Figure 20F clearly shows that the sensor element 916 is separated from the substrate 901b by layers 902, 915 and 922. It is doubtful that the layers separating sensor element 916 from the substrate 901b could be construed as part of either the sensor element 916 or the substrate 901b. Nonetheless, in an effort to further the prosecution of this application the claims have been amended herein to even more clearly set forth the metes and bounds of the invention. For example, claim 1 has been amended to recite “a micromechanical sensor element formed on the semiconductor substrate and comprising a microengineered movable element.” Kusunoki does not teach or suggest this feature of the amended claims, or similar features of other claims. Instead, element 916 is formed on an insulating film 902, as shown, for example, in Figures 20F and 21B of the Kusunoki patent (see col. 25, lines 46-48).

Therefore, it is respectfully submitted that Kusunoki’s micromechanical sensor, element 916, is not “formed on the semiconductor substrate,” as recited in amended claims 1 and 12, or “formed on the substrate,” as recited in claims 13, 25 and 26. Further, it is submitted that Kusunoki does not teach or suggest “a moveable microengineered input element formed on the substrate,” as recited in amended claim 13. Finally, it is submitted that Kusunoki does not teach or suggest an integrated circuit provided on a semiconductor substrate with a unified input

element and display element which includes “a moveable microengineered input element formed on the substrate that senses a condition,” as recited in claim 25, or the similar feature recited in claim 26. The other patents relied upon in the Office Action do not overcome these deficiencies of Kusunoki.

Accordingly, it is respectfully submitted that the Kusunoki patent, the Kakehi patent and/or the Holm patent, either taken singly or as hypothetical combinations, do not teach or suggest the features of the claims. Withdrawal of the rejections is respectfully requested.

CONCLUSION

In view of the foregoing, it is respectfully submitted that the application is in condition for allowance. However, should there remain any unresolved issues, the Examiner is kindly invited to contact applicant's representative, Scott Richardson, at telephone number 1.703.739.0573 so that such issues may be resolved as expeditiously as possible.

Respectfully submitted,



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